

REMARKS

Claims 40-80 are pending in the application. Claims 40-80 were rejected. Claims 48, 51, 54, 56-58, 62-64, 66, 72-74, 77, and 78 are amended. Claims 40 and 67 are the independent claims. Reconsideration of the amended application is respectfully requested.

The undersigned would like to thank the Examiner for conducting an interview on April 1, 2003. As explained during the interview, MRI systems have been improved in recent years, particularly to reduce the time necessary to perform a scan and to expand the space in which a patient must be positioned during the scan. However, the perception persists that an MRI scan requires a patient to remain still in a claustrophobic space for a period of time that is uncomfortably long. This misconception is prevalent not only among potential patients, who experience anxiety at the thought of undergoing an MRI scan, but also among medical personnel who haven't had experience with more modern systems. MRI system manufacturers have a particularly difficult time in convincing patients and medical personnel that advancements in the field have overcome the traditional problems through the use of conventional marketing material. Patients and medical personnel alike respond better to actual demonstrations of MRI scans using newer systems, whether the demonstration is a real scan or a simulation. In this way, they can experience the more comfortable process, which overcomes the anxiety that is a unique obstacle for MRI manufacturers.

The difficulty in providing live demonstrations of a scan procedure is convincing people to go to the scanner location to experience the demonstration. Scanners are large and expensive, and it is not feasible to provide demonstration models at a number of

convenient locations to make it easier for people to attend a presentation. Because of the size of the system, mobile units for this purpose have not been constructed previously, and there has otherwise been no reason to fabricate a simulation system. The present inventors have developed the claimed system to overcome the barriers particular to MRI scanner marketing, which barriers have not been addressed previously in this manner.

The Examiner rejected claims 54 and 56-66 under 35 USC §112, first paragraph, as including subject matter that was not described in the specification in such a way as to enable one of skill in the art to make or use the invention. The Examiner asserted that no structural features are disclosed in the specification that would enable the limitation that the scanner device is expandable laterally.

Claim 54 is amended to recite that the frame of the scanner device is wider than the width of the platform. This particular embodiment is shown in Fig. 2, and is described on page 11, at lines 4-7. Claim 56 is amended to define that portion of the scanner frame that is wider than the platform as an overhang portion, which overhangs the peripheral edge of the platform, also shown in Fig. 2. Claims 57, 58, 62, and 63 are amended for consistency, and claims 64 and 65 are amended to recite elements consistent with claim 63. The rejection of claims 54 and 56-66, therefore, should be withdrawn.

The Examiner rejected claims 51, 56-66, and 77 under 35 USC §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter that the applicants regard as the invention. The Examiner asserted that certain terms are very broad, and do not define the structural elements that are intended to be encompassed by the claims.

Claim 51 is amended to delete “electronics equipment”. Claim 56 is amended as noted above and no longer recites an “unexpanded portion”. Claim 76 was previously amended and no longer recites “informational material”. Claim 77 is amended to change “marketing information” to “sales brochures”. It is respectfully submitted that the new recitations are definite, and the rejections should be withdrawn.

The Examiner rejected claims 40-43, 47-49, 53, 67-73, 76, 77, 79, and 80 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley, and further in view of the MGH Hotline reference (“MGH”).

Claim 40 recites a mobile nuclear magnetic resonance imaging demonstration system. The system includes a wheeled ground transport vehicle having a platform, a fully assembled scanner device, disposed on the platform, and control equipment, disposed on the platform. The scanner device simulates an operational magnetic resonance imaging scanner, under control of the control equipment. The wheeled ground transport vehicle is operational to transport the fully assembled scanner device and control equipment.

Liberman discloses a carrying case for a display board that carries information, electrical components, and product samples, and a separate trailer or truck for accommodating a group of people who will watch a sales presentation of the product samples. The trailer can be outfitted with chairs, in the manner of a classroom. See column 1, lines 58-65; column 2, lines 23-25. As disclosed, the trailer or truck is set up at the location of the presentation, and the product samples and sales information are transported separately to the site prior to the presentation. See column 1, lines 52-58 and 63-65. Thus, Liberman discloses samples of products that are transported for display to

potential customers, but these samples are small enough to be attached and held on a display board. Liberman does not disclose transporting these samples or display boards on the platform of the trailer or truck, and does not disclose a simulated operational system to a location for viewing by potential customers. That is, Liberman does not disclose a fully assembled device and control equipment, disposed on a platform of a transport vehicle for transporting the device and control equipment, as recited in independent claim 40. Rather, Liberman discloses a trailer for giving a presentation, and a display board for displaying product samples that is transported separately to the trailer.

Crowley et al. disclose a remotely positioned MRI system. Crowley et al. disclose that the MRI system is compact and remotely positionable, but do not disclose such a system that is mobile. The Examiner asserted that Crowley et al. disclose, in the passage spanning column 5, line 38 through column 7, line 59, an example of a portable imaging device 2. In this passage, Crowley et al. describe an imaging device, but it is not disclosed or suggested that this imaging device is portable or otherwise mobile, in the noted passage or elsewhere in the reference. At column 1, lines 7-9, Crowley et al. state that the present invention relates to remotely-positionable MRI systems that use magnets that do not surround an object. At column 2, lines 31-34, Crowley et al. relate that conventional MRI systems require large magnets, are bulky and cumbersome, and are effectively immobile. It cannot be reasonably inferred that the Crowley et al. system is mobile just because the immobile nature of prior art systems is noted; mobility of their own system must be disclosed in order to provide a valid teaching of this feature.

Likewise, Crowley et al.'s recognition that smaller magnets can be used in MRI systems (column 2, lines 61-64) is not a sufficient teaching that the disclosed system is

mobile. At column 5, lines 7-10, Crowley et al. express that one of their objectives is to provide a compact MRI system, but does not describe a mobile system. They also describe in that passage their objective to provide an MRI device that is remotely positionable “relative to the object being imaged”, and do not state an objective to provide a mobile MRI device. At column 7, lines 53-56, Crowley et al. disclose that the integrated surface unit 12 can be hand held, but do not suggest that the entire scanner is mobile.

The Crowley et al. MRI device 10 includes an integrated surface unit 12 (magnets and antenna) that is connected to a control console 16 by a movable gantry 14. In this way, an operator at the control console can remotely position the integrated surface unit, which is remotely positionable by movement of the gantry. See column 7, lines 43 through 53 and Fig. 1. However, the system is conventional in other respects, and there is no suggestion that there would be any advantage to making the scanner mobile by disposing it on a trailer. Further, Crowley et al. do not disclose, teach, or suggest a fully assembled scanner device that simulates an operational magnetic resonance imaging scanner, as recited in claim 40.

The Examiner asserted that MGH discloses a mobile MRI system that can be placed on a trailer. While it is true that the title of the MGH reference is “Mobile MRI units installed”, a close reading of the article shows that a mobile MRI unit is not actually disclosed. The article actually describes that temporary, stationary MRI systems were set up in trailers due to a lack of space in the hospital facility. Specifically, the article states that “the MGH has installed two temporary MRI scanners,” which were “temporarily housed in trailers adjacent to Founders until the Ellison 2 MRI suite expansion is

completed.” Thus, MGH describes MRI systems that were set up in trailers that are accessible from a main hospital building, because the building itself had no room for the systems. A planned expansion of the hospital building would provide permanent housing for the systems. Despite the wording of the title, the article does not describe a mobile MRI system, and certainly does not describe a fully assembled scanner device that simulates an operational magnetic resonance imaging scanner, as recited in claim 40. The disclosure by MGH that there was no room for an adequate number of operational MRI systems would tend to teach away rather than suggest the benefit of a simulation system used for demonstration purposes.

Thus, the Liberman, Crowley et al., and MGH references disclose a trailer set up to give demonstrations related to product samples transported separately on a display board, and fully-function, non-mobile MRI scanner, and trailers, accessible to a permanent structure, for temporarily housing MRI systems until expansion of the permanent structure takes place, respectively. No mobile MRI demonstration system is disclosed or suggested, no scanner device that simulates an operational MRI scanner is disclosed or suggested, and no wheeled transport vehicle, operational to transport the scanner device and control equipment, is disclosed or suggested. Absent disclosure of these elements, no combination of the teachings of the cited references could render obvious the invention recited in claim 40.

Further, there is no suggestion to combine the teachings of these references. Crowley et al. and MGH both disclose MRI scanners, but neither teaches any advantage to making them mobile. The MGH reference includes an erroneous headline that calls the MRI units mobile; however, the text of the article makes it clear that the units are

immobile and are not intended to be transported. No motivation for transporting them is given. Liberman discloses conducting sales demonstrations in a trailer. Liberman does not suggest transporting sales samples on the trailer platform.

Claims 41-43, 47-49, and 53 all depend from claim 40, and therefore cannot be rendered obvious by any combination of the teachings of the cited references, for the reasons stated above, and in view of the additional features they recite. For example, amended claim 48 recites a simulated MRI image display. None of the cited references discloses or suggests this claimed feature.

For at least the reasons set forth above, the rejection of claims 40-43, 47-49, and 53 should be withdrawn.

Claim 67 recites a method of demonstrating operation of a nuclear magnetic resonance imaging system. According to the claimed method, a fully assembled scanner device and control equipment are disposed on a platform. The platform is connected to a wheeled ground transport vehicle. The platform with the fully assembled scanner device and the control equipment are transported to a location of interest. The scanner device is caused to simulate an operational magnetic resonance imaging scanner, under control of the control equipment, at the location of interest.

Liberman discloses a carrying case for a display board that carries information, electrical components, and product samples, and a separate trailer or truck for accommodating a group of people who will watch a sales presentation of the product samples. The trailer can be outfitted with chairs, in the manner of a classroom. See column 1, lines 58-65; column 2, lines 23-25. As disclosed, the trailer or truck is set up at the location of the presentation, and the product samples and sales information are

transported separately to the site prior to the presentation. See column 1, lines 52-58 and 63-65. Thus, Liberman discloses samples of products that are transported for display to potential customers, but these samples are small enough to be attached and held on a display board. Liberman does not disclose transporting these samples or display boards on the platform of the trailer or truck, and does not disclose a simulated operational system to a location for viewing by potential customers. That is, Liberman does not disclose disposing the “product samples” on a platform, connecting the platform to a transport vehicle, and transporting the platform with the “product samples” to a location of interest. Liberman also does not disclose performing these actions, wherein the “product samples” is a scanner device and control equipment, as recited in independent claim 67. Rather, Liberman discloses a trailer for giving a presentation, and a display board for displaying product samples that is transported separately to the trailer.

Crowley et al. disclose a remotely positioned MRI system. Crowley et al. disclose that the MRI system is compact and remotely positionable, but do not disclose such a system that is mobile. The Examiner asserted that Crowley et al. disclose, in the passage spanning column 5, line 38 through column 7, line 59, an example of a portable imaging device 2. In this passage, Crowley et al. describe an imaging device, but it is not disclosed or suggested that this imaging device is portable or otherwise mobile, in the noted passage or elsewhere in the reference. At column 1, lines 7-9, Crowley et al. state that the present invention relates to remotely-positionable MRI systems that use magnets that do not surround an object. At column 2, lines 31-34, Crowley et al. relate that conventional MRI systems require large magnets, are bulky and cumbersome, and are effectively immobile. It cannot be reasonably inferred that the Crowley et al. system is

mobile just because the immobile nature of prior art systems is noted; mobility of their own system must be disclosed in order to provide a valid teaching of this feature.

Likewise, Crowley et al.'s recognition that smaller magnets can be used in MRI systems (column 2, lines 61-64) is not a sufficient teaching that the disclosed system is mobile. At column 5, lines 7-10, Crowley et al. express that one of their objectives is to provide a compact MRI system, but do not describe a mobile system. Reasons exist for desiring a compact system that are completely unrelated to mobility. For example, in smaller diagnostic facilities, it is advantageous to use scanning systems that are not very expansive. Crowley et al. also describe in the noted passage their objective to provide an MRI device that is remotely positionable "relative to the object being imaged", and do not state an objective to provide a mobile MRI device. Many remotely-positionable systems exist, and in many cases are only remotely-positionable at installation, after which time they are operated as conventional systems. The feature of being remotely-positionable is unrelated to, and does not imply, mobility. At column 7, lines 53-56, Crowley et al. disclose that the integrated surface unit 12 can be hand held, but do not suggest that the entire scanner is mobile.

The Crowley et al. MRI device 10 includes an integrated surface unit 12 (magnets and antenna) that is connected to a control console 16 by a movable gantry 14. In this way, an operator at the control console can remotely position the integrated surface unit, which is remotely positionable by movement of the gantry. See column 7, lines 43 through 53 and Fig. 1. However, the system is conventional in other respects, and there is no suggestion that there would be any advantage to making the scanner mobile by disposing it on the platform of a transport vehicle. Further, Crowley et al. do not

disclose, teach, or suggest causing a scanner device to simulate an operational MRI scanner, under the control of control equipment, at a location of interest to which it has been transported, as recited in claim 67.

The Examiner asserted that MGH discloses a mobile MRI system that can be placed on a trailer. While it is true that the title of the MGH reference is “Mobile MRI units installed”, a close reading of the article shows that a mobile MRI unit is not actually disclosed. The article actually describes that temporary, stationary MRI systems were set up in trailers due to a lack of space in the hospital facility. Specifically, the article states that “the MGH has installed two temporary MRI scanners,” which were “temporarily housed in trailers adjacent to Founders until the Ellison 2 MRI suite expansion is completed.” Thus, MGH describes MRI systems that were set up in trailers that are accessible from a main hospital building, because the building itself had no room for the systems. A planned expansion of the hospital building would provide permanent housing for the systems. Despite the wording of the title, the article does not describe a mobile MRI system, and certainly does not describe causing a scanner device to simulate an operational MRI scanner, under the control of control equipment, at a location of interest to which it has been transported, as recited in claim 67. The disclosure by MGH that there was no room for an adequate number of operational MRI systems would tend to teach away rather than suggest the benefit of a simulation system used for demonstration purposes.

Thus, the Liberman, Crowley et al., and MGH references disclose a trailer set up to give demonstrations related to product samples transported separately on a display board, and fully-function, non-mobile MRI scanner, and trailers, accessible to a

permanent structure, for temporarily housing MRI systems until expansion of the permanent structure takes place, respectively. No mobile MRI demonstration system is disclosed or suggested, no scanner device that simulates an operational MRI scanner is disclosed or suggested, and no wheeled transport vehicle, operational to transport the scanner device and control equipment to a location of interest, is disclosed or suggested. Absent disclosure of these elements, no combination of the teachings of the cited references could render obvious the invention recited in claim 67.

Further, there is no suggestion to combine the teachings of these references. Crowley et al. and MGH both disclose MRI scanners, but neither teaches any advantage to making them mobile. The MGH reference includes an erroneous headline that calls the MRI units mobile; however, the text of the article makes it clear that the units are immobile and are not intended to be transported. No motivation for transporting them is given. Liberman discloses conducting sales demonstrations in a trailer. Liberman does not suggest transporting sales samples on the trailer platform.

Claims 68-73, 76, 77, 79, and 80 all depend from claim 67, and therefore cannot be rendered obvious by any combination of the teachings of the cited references, for the reasons stated above, and in view of the additional features they recite. For example, amended claim 72 recites providing a simulated visual presentation of an MRI scanning sequence to viewers. None of the cited references discloses or suggests this claimed feature.

For at least the reasons set forth above, the rejection of claims 67-73, 76, 77, 79, and 80 should be withdrawn.

The Examiner rejected claims 44 and 45 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al. and MGH, and further in view of Sheehan et al. In particular, the Examiner cited the passage at column 5, lines 26-42 as disclosing a medical device and a base unit that are connected by wireless means.

Claims 44 and 45 depend from claim 40. As discussed above, Liberman, Crowley et al., and MGH together fail to disclose all the features of claim 40. Sheehan et al. fail to overcome this deficiency. For example, Liberman, Crowley et al., and MGH all fail to disclose a mobile MRI demonstration system, as recited in claim 40. Sheehan et al. also fail to disclose or suggest this feature, and therefore no combination of the cited references could render obvious the claimed invention.

Claim 44 recites that the control equipment of the system of claim 40 communicates with the scanner device in order to control the scanner device by wireless link. Claim 45 recites that the wireless link is an infrared link.

Sheehan et al. disclose a prescription-controlled data collection system. The system passes prescription information and other medical information to a server, via a base unit. This information can be provided by a patient through the use of a data collection device. The passage cited by the Examiner discloses that the data collection device can communicate with the base unit over any of a number of communication channel means, including via wireless infrared communication. However, Sheehan et al. do not disclose wireless communication between a device and control equipment, by which the control equipment controls the device, as recited in claim 44. Sheehan et al. only disclose the wireless transfer of information, not of control communication. That is, Sheehan et al. provide a wireless transfer of data between two points. See column 5, lines

26-39. Sheehan et al. do not disclose the wireless communication of control between control equipment and a controlled device, as recited in claims 44 and 45. Nothing is controlled wirelessly in the Sheehan et al. system; only data is transmitted. For at least the given reasons, the rejection of claims 44 and 45 should be withdrawn. This distinguishing feature was presented in a previous response, with no rebuttal from the Examiner. It is respectfully requested that Examiner address the foregoing argument if it is found to be unpersuasive.

The Examiner rejected claims 46, 50, 74, and 75 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al. and MGH, and further in view of Lysysanski et al. In particular, the Examiner cited the passage at column 5, lines 12-62 as disclosing a simulated imaging device.

Claims 46 and 50 depend from claim 40. Claims 74 and 75 depend from claim 67. As discussed above, Liberman, Crowley et al., and MGH together fail to disclose all the features of claims 40 and 67. Sheehan et al. fail to overcome this deficiency. For example, Liberman, Crowley et al., and MGH all fail to disclose a mobile MRI demonstration system, as recited in claim 40. Also for example, Liberman, Crowley et al., and MGH all fail to disclose transporting a platform with a fully assembled scanner device and control equipment to a location of interest, as recited in claim 67. Lysysanski et al. also fail to disclose or suggest these features, and therefore no combination of the cited references could render obvious the claimed invention.

Claim 46 recites that the control equipment of claim 40 simulates MRI diagnostic equipment. Claim 50 recites that the scan images shown on a simulated MRI image display are previously-recorded scan images. Claim 74 recites that the visual

demonstration of an MRI scanning sequence shown to viewers is a pre-recorded representation of a scanning sequence. Claim 75 recites that the control equipment of claim 67 simulates MRI imaging scanner diagnostic equipment.

Lysyansky et al. disclose an ultrasound training system, which retrieves and displays previously-stored ultrasound data to simulate an ultrasound scanning session. Thus, an ultrasound session is simulated in a way that personnel can be trained under supervised conditions. However, the ultrasound system 10 includes an image registration module 16 that actually causes the system to acquire an image of an ultrasound phantom 18 via an ultrasound probe 12, as disclosed in the passage cited by the Examiner. This image is used by the system to call up with a pre-recorded image spatially corresponding to the phantom, for improved simulation. Thus, simulated diagnostic control equipment, as recited in claim 46 and 75, is not disclosed.

Further, Lysyansky et al. do not disclose such a system as applied to an MRI scanning system, nor do they disclose that such a system can be made mobile by disposing the system on the platform of a transport vehicle, nor do they disclose or suggest any motivation for making such a system mobile. Such motivation or suggestion is also not provided in any of the other cited references. For example, a reading of the Lysyansky et al. reference does not give one the indication that an ultrasound procedure would be difficult for an ultrasound professional to grasp, nor that such a procedure might cause anxiety in a patient, or suggest any other problem that could be overcome by making the system mobile for demonstration purposes. Other than for training purposes in a medical facility at which such procedures would actually take place, Lysyansky et al. offer no motivation for its use. Further, there is no suggestion in this or any of the other

cited references that the teachings of this reference should be applied to an MRI scanning system, mobile or otherwise.

For at least the foregoing reasons, the rejection of claims 46, 50, 74, and 75 should be withdrawn.

The Examiner rejected claims 51 and 52 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al. and MGH, and further in view of Wacker. In particular, the Examiner cited the passage at column 11, lines 43-51 as disclosing a mobile display unit having a network access point, and the passage at column 11, lines 61-65 as disclosing audio-visual equipment.

Claim 51 recites that the presentation area of the transport vehicle includes a video monitor for presenting pre-recorded audiovisual presentations related to the MRI scanner. Claim 52 recites that the presentation area of the transport vehicle includes a terminal connected for communication via a network.

In contrast, Wacker discloses an on-site media trailer for editing film and video productions at the recording site. See column 2, lines 1-20. That is, Wacker discloses a mobile video and film processing trailer; the purpose of the trailer is to facilitate the production of video presentations at the site of recording, and not to play video presentations at a point of interest remote from the recording site. Wacker discloses a trailer having a purpose and function that is the opposite of that of the claimed invention.

Further, Wacker does not disclose audio-visual equipment for providing pre-recorded presentations that are related to operation of the magnetic resonance imaging scanner, or any other system disposed on the trailer platform, as recited in claim 51. There is no system of any kind present in the Wacker trailer, nor is there intended to be a

system present. Further, there is no motivation provided to provide the audio-visual equipment and network disclosed by Wacker to the Liberman or Crowley et al. inventions, or to the MGH set-up. None of these previously-discussed systems has a purpose for video production as disclosed by Wacker. Liberman discloses electrical components on the display board that provide demonstration effects; neither reference suggests adding video editing equipment to the Liberman display carrying case, or portable display boards to the Wacker media trailer. Similarly, no motivation is provided to provide the remotely-positionable MRI scanner disclosed by Crowley et al. to the film editing equipment and network in the Wacker trailer. The MGH set-up would not benefit from a video editing facility. Such combination of teachings is improper, and would not result in the claimed invention.

For at least this reason, the rejection of claims 51 and 52 should be withdrawn. This distinguishing feature was presented in a previous response, with no rebuttal from the Examiner. It is respectfully requested that Examiner address the foregoing argument if it is found to be unpersuasive.

The Examiner rejected claims 54-56 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al. and MGH, and further in view of Migurski et al. In particular, the Examiner cited the passage at column 17, line 29 through column 18, line 65 and Figs. 6A-6G as disclosing a system and method for transporting medical equipment to remote locations.

Amended claim 54 recites that the frame of the scanner device is wider than the platform of the wheeled ground transport vehicle. Claim 55 recites that the scanner

device is a full-scale replica of an actual MRI scanner. Claim 56 recites that an overhang portion of the scanner frame overhangs a peripheral edge of the platform.

In contrast, Migurski et al. disclose a vehicle-transportable field emergency medical system. This system includes an operating/post-op area and multiple triage areas, all within a transportable enclosure. The citation by the Examiner describes that modules of the system are positionable on wheeled bases after being delivered to the desired location, but actual deployment of the system to the site takes place by helicopter or C130 transport aircraft. See column 3, lines 58-64; column 4, lines 9-30.

The cited passage also shows that the module 97 enclosure is expandable into a surgical suite from its transport configuration. That is, the room or shelter housing the medical equipment is expandable. However, Migurski et al. do not disclose medical equipment that itself has a frame that overhangs its transport platform, and certainly do not disclose an MRI scanning system, or any large medical diagnostic equipment at all. Migurski et al. disclose medical platforms and supplies for triage and surgical support, as well as electronic communications equipment, but no diagnostic or demonstration systems, expandable or otherwise.

Further, there is no motivation provided in any of the references to combine the teachings of Migurski et al. with those of any of the other references. Liberman is a display case for a mobile sales unit. Migurski et al. is a fully functional surgical stage for use in remote areas during emergencies. No suggestion is provided to combine these teachings, and no advantage can be discerned for combining the features of the two inventions. Crowley et al. and MGH disclose functional, immobile MRI systems. These are not compatible with the Migurski et al. transportable emergency surgical suite. That

is, in an emergency, it is not likely that the lightweight, efficient surgical suite disclosed by Migurski et al. would include a fully functional MRI system, and there is no suggestion provided in any reference to do so. Further, as applied to the claims, a lightweight, helicopter-deployed surgical suite is not suitable for combination with any reference in an effort to render obvious a mobile simulated MRI system disposed on a wheeled ground transport vehicle.

In summary, Migurski et al. do not disclose the recited element, namely, an MRI scanner frame that overhangs its transport platform. Further, there is no motivation for one of skill in the art to combine the teachings of this reference with the other cited references. Still further, the reference itself is not applicable to the claimed invention, such that use of this reference as part of any combination in an attempt to render obvious the claimed invention would be improper.

For at least the reasons stated above, the rejection of claims 54-56 should be withdrawn. Substantially the same argument was presented in a previous response, with no rebuttal from the Examiner. It is respectfully requested that Examiner address the foregoing argument if it is found to be unpersuasive.

The Examiner rejected claims 57-61 and 63-66 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al., MGH, and Migurski et al., and further in view of Fernandez.

Claim 57 recites that the transport vehicle includes an enclosure disposed over the platform, including an opening to accommodate the overhang portion. Claim 58 recites that the platform includes an extension that supports the overhang portion. Claim 59 recites a stand that supports the weight of the extension. Claim 60 recites that the stand is

adjustable in height. Claim 61 recites that the stand is a rod having a threaded end attached to the extension. Claim 63 recites an enclosure bay that encloses the overhang portion. Claim 64 recites a stand that supports the weight of the enclosure bay. Claim 60 recites that the stand is adjustable in height. Claim 61 recites that the stand is a rod having a threaded end attached to the enclosure bay.

Fernandez discloses a mobile movie cinema, housed in a trailer that extends outwardly in its operational configuration. However, no MRI scanning system is disclosed, so Fernandez fails to overcome the deficiency of the other references in disclosing a mobile MRI system. In fact, adding an MRI scanning system or any other large system to the Fernandez platform would frustrate the purpose of the Fernandez invention, which is to provide a mobile enclosure, in which movies can be shown to an audience. As shown in Figs. 3 and 4 and disclosed at column 2, line 46 through column 3, line 21, the Fernandez enclosure is intended to be filled with seats for patrons to sit in while watching a movie projected on a wall of the enclosure.

Further, there is no motivation in any of the cited references to combine the teachings of this reference with the teachings of any other reference in an attempt to render obvious the claimed invention. Liberman discloses a display and carrying case for product samples and promotional material that can be used for presentations, but does not suggest that use of the case with an expandable trailer would be advantageous. Crowley et al. and MGH disclose MRI scanners, but do not suggest that the scanner can be made mobile through placement on an expandable trailer. Migurski et al. disclose a modular surgical suite that is transported by cargo carrier or helicopter and that already has expansion features that are put to use on deployment. The Migurski et al. system would

not benefit from an expandable ground transport trailer, and there is no suggestion of such a benefit. For at least the reasons stated above, the rejection of claims 57-61 and 63-66 should be withdrawn.

The Examiner rejected claim 62 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al., MGH, Migurski et al., and Fernandez, and further in view of Wright.

Claim 62 recites an overhang panel that extends from the enclosure to project over the overhang portion.

Wright discloses an awning that is put in place above steps outside a trailer. However, no MRI scanning system is disclosed, and there is no motivation in any of the cited references to combine the teachings of this reference with the teachings of any other reference in an attempt to render obvious the claimed invention. That is, Liberman discloses a display and carrying case for product samples and promotional material that can be used for presentations, but does not suggest that use of an awning to shield the case would be advantageous. Crowley et al. disclose a remotely-positionable MRI scanner, but does not suggest any advantage for the use of an awning or for placement inside a trailer. MGH discloses an MRI scanner housed in a stationary trailer, but does not suggest any advantage for the use of an awning on the trailer. Migurski et al. disclose a modular surgical suite that is transported by cargo carrier or helicopter and that is completely enclosed. The Migurski et al. system would not benefit from an outside awning, and there is no suggestion of such a benefit. The Fernandez trailer is fully covered, as are the stairs leading into the enclosure, and an awning would not be

beneficial, nor is such a benefit suggested. The rejection of claim 62 should be withdrawn.

The Examiner rejected claim 78 under 35 USC §103(a) as being unpatentable over Liberman, in view of Crowley et al. and MGH, and further in view of Spitzer et al. Specifically, the Examiner stated that Spitzer et al. disclose, in the passage spanning column 1, line 16 through column 2, line 30 requesting feedback from customers and making various changes to the product and to marketing strategies in accordance with the feedback. The Examiner also stated that Spitzer et al. disclose that a written questionnaire can be used, at column 2, lines 23-26.

Amended claim 78 recites distributing questionnaires to viewers of a live presentation of a simulated MRI scanning sequence, asking the viewers to respond to the questionnaire, retrieving and analyzing the responses, and determining whether particular changes should be made, based on the analysis.

Spitzer et al. disclose a method of conducting marketing research by using videotaped productions. According to this invention, a product description or advertisement is recorded on videotape, and presented once only to members of a target group. The group is then given a written questionnaire to answer. The responses to the questionnaires are used to evaluate the effectiveness of the videotaped presentation. Providing questionnaires following the presentation of a live demonstration of the product is not disclosed. In fact, it is specifically disclosed that the videotape presentation is provided instead of the use of a product sample or live person demonstrating the product. See column 1, lines 23-37. In contrast, the claimed method recites a live presentation of simulated use of a scanner device. Thus, this reference

teaches away from the claimed invention, and is not proper for combination with any other reference in an attempt to render obvious the claimed invention. The rejection of claim 78, therefore, should be withdrawn.

In summary, the main references cited by the Examiner, Liberman and Crowley et al., do not have teachings that are combinable, such combination is not suggested, and any such combination would not include all the elements of the claims of the invention against which they are asserted. Liberman discloses a carrying case for display boards that hold electrical components, informational matter, and product samples, for the purpose of marketing the product. This carrying case is transported to a trailer that has already been set up for providing a presentation of the product. Crowley et al. disclose a remotely-positionable functional MRI scanner, but does not disclose an MRI scanner that is mobile. The Liberman display is transported and presented in a mobile vehicle but, other than the samples attached to the display board, there is no suggestion that the vehicle should include an operational simulated medical diagnostic device, as recited in the claims. Crowley et al. do not suggest any reason for making the disclosed MRI scanner mobile, or for having a simulation model disposed on a ground transport vehicle, as recited in the claims. None of the other cited references provides a teaching of any of the missing elements, or any suggestion to combine the teachings of these two references.

Based on the foregoing, it is submitted that all rejections have been overcome. It is therefore requested that the Amendment be entered, the claims allowed, and the case passed to issue.

This amendment is submitted in the third extension month for response. A petition for extension of time is submitted herewith, along with a check in payment of the fee for the extension. If this payment is missing, or is made in an insufficient amount, please charge any deficiency to our deposit account, No. 501998, and notify us accordingly.

Please note the formal change of address that is re-submitted with this Amendment. The new correspondence address is also shown below.

Respectfully submitted,

February 12, 2004

Date



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